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EDWARD BENNETT WILLIAMS (1920-1988)  
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January 14, 2025

Via ECF

Hon. Jessica G. L. Clarke  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
Courtroom 11B  
New York, NY 10007-1312

Re: United States v. Anton Peraire-Bueno and James Peraire-Bueno, Case No. 1:24-cr-00293; Consent Motion to Modify Defendants' Bond Conditions

Dear Judge Clarke:

With the consent of Pretrial Services and the government, Defendants James Peraire-Bueno ("James") and Anton Peraire-Bueno ("Anton") respectfully request modification to their bond conditions related to travel.

Defendants request their respective travel conditions of release be modified as follows:

Defendants are permitted to travel to, from, and within the S.D.N.Y., E.D.N.Y., and D. Mass., as well as to the D.D.C. for legal consultation. Additionally, upon 72 hours' advance notice of their itinerary to Pretrial Services and counsel for the government and the consent of Pretrial Services and the government, the defendants are permitted to travel within the continental United States.

The current restrictions on travel are no longer required to reasonably assure James and Anton's presence in court. *See* 18 U.S.C. § 3142(c)(1)(B) (requiring imposition of the least restrictive conditions that will reasonably assure the appearance of the defendant).

All other conditions of release would remain in effect for both defendants: appearance bonds of \$250,000 for each, which have been secured by real property owned by their parents; surrender of passports and prohibition on obtaining new passports; prohibition on possession of firearms; supervision as directed by pretrial services; prohibition on discussing

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case with co-defendant except in the presence of counsel; prohibition on trading securities, commodities, or cryptocurrency, or validating blockchain transactions; and requirement for pretrial services permission to open new business/personal accounts, cryptocurrency accounts, loans, liens, or lines of credit.

Counsel for the government and the defendants' respective Pretrial Services officers all consent to this requested modification.

Sincerely,

*/s/ Katherine Trefz*

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